

Dangerous Waste Regulations



**The requirements for
LQGs, MQGs, and SQGs**

Quick Review

- ❖ Dangerous Waste Regulations, [Ch. 173-303 WAC](#)
- ❖ All businesses must designate their waste and apply the appropriate waste code(s)
- ❖ DW Generators must count their wastes
- ❖ Amount/month = status:
 - LQG = > 2,200 pounds (>2.2 pounds AHW/EHW)
 - MQG = >220 pounds but <2,200 pounds (<2.2 pounds AHW/EHW)
 - SQG = <220 pounds (<2.2 pounds AHW/EHW)
- ❖ Some special cases for counting



RCRA Site ID Number – MQG/LQG

([WAC 173-303-060](#))

- ❖ MQGs and LQGs must notify Ecology
- ❖ Get an EPA/State RCRA Site ID#
- ❖ Get information about notifying at:

www.ecy.wa.gov/programs/hwtr/waste-report/notification.html

- ❖ ID# specific to the physical location, not the business name
- ❖ SQGs may also notify



Personnel Training - LQG

([WAC 173-303-330](#))

- ❖ Proper training helps ensure good waste management
- ❖ Must have written training plan
 - Job titles
 - Job descriptions
 - Required training for each position
 - Names of everyone in those jobs
- ❖ Training relevant to the position
- ❖ Keep records



Contingency Plan - LQG

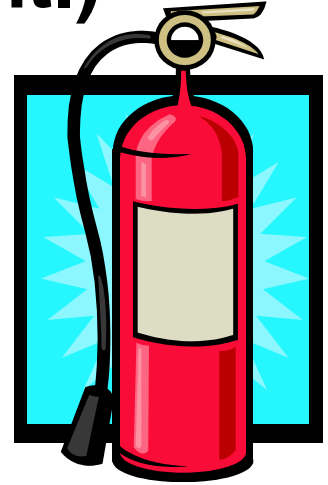
([WAC 173-303-350](#))

- ❖ Must be written
- ❖ Describes how you will respond to emergencies
- ❖ Describes arrangements with local emergency responders
 - ([WAC 173-303-340](#))
- ❖ Lists your Emergency Coordinators (EC)
 - One person listed as **primary EC**
 - Names, addresses, home and work phone numbers



Contingency Plan – LQG (cont.)

- ❖ Lists all emergency equipment
 - Location, description, capabilities
- ❖ Describes evacuation plan(s)
 - Signal; primary and secondary routes
- ❖ Keep copy onsite and send to local emergency responders
- ❖ Can be part of EPA Spill Prevention, Containment, and Control plan or other emergency response plan
 - Must cover all the required points.



Arrangements With Local Authorities – MQG/LQG [\(WAC 173-303-340\)](#)

- ❖ Applies to MQGs and LQGs
- ❖ Familiarize fire, police, and emergency with the facility and wastes handled
- ❖ Familiarize local hospitals with properties of wastes handled and potential injuries
- ❖ Record any agreements for emergency response, clean-up contractors, etc.



Emergency Equipment - MQG/LQG

([WAC 173-303-340](#))

- ❖ Internal communications or alarm system
- ❖ Telephone, radio, etc.
- ❖ Fire extinguishers (appropriate types)
- ❖ Spill control equipment
- ❖ Decontamination equipment
- ❖ Water at sufficient pressure to make sprinkler system work

Emergency Communications - MQG/LQG

[\(WAC 173-303-340\)](#)

- ❖ Immediate access to a way to summon help
- ❖ Telephone, radio, cell phone, visual or voice contact with another employee



Emergency Coordinators – All Generators

([WAC 173-303-201](#), [-360](#))

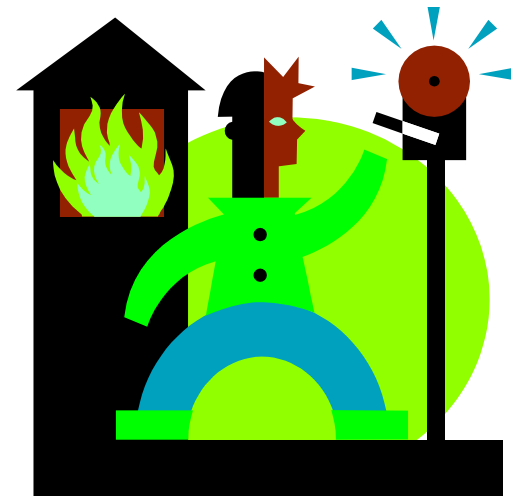
- ❖ Must be **onsite or on call** and able to respond quickly
- ❖ Responsible for coordinating emergency response
- ❖ Familiar with plan, operations and layout of facility, location and properties of wastes, and records
- ❖ Different rules for MQG & LQG

Emergency Response - MQG/LQG

(WAC 173-303-360)

- ❖ Emergency Coordinator must respond to emergencies
 - Immediately use internal alarms/ communication as appropriate
- ❖ Assess possible hazards to human health and the environment
- ❖ Alert local responders as needed

(See the Emergency Numbers form
in the Attachments Folder)

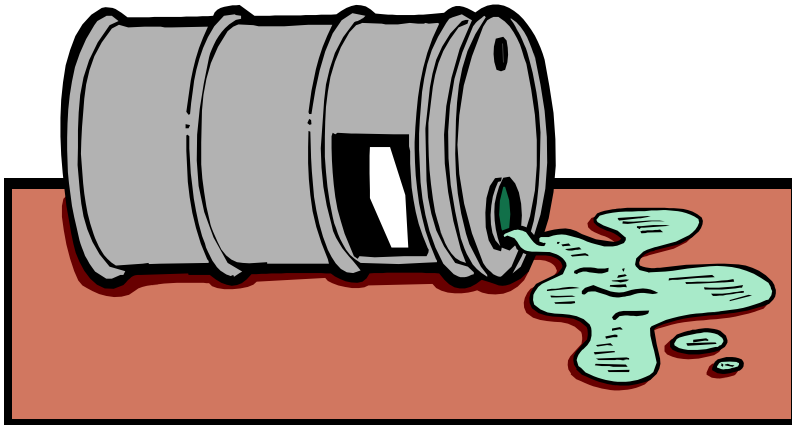


Emergency Response – MQG/LQG cont.

[WAC 173-303-360](https://www.wa.gov/legislative/rulemaking/rulemaking.aspx?rule=WAC%2F173%2F303%2F360)

- ❖ Notify Ecology and local agencies
- ❖ Notify National Response Center
 - (1-800-424-8802)
- ❖ Stop the situation from getting worse
- ❖ Clean up after yourself
- ❖ Record any incident that requires using your contingency plan
- ❖ Send the record to Ecology





Spill Reporting

(WAC 173-303-145)

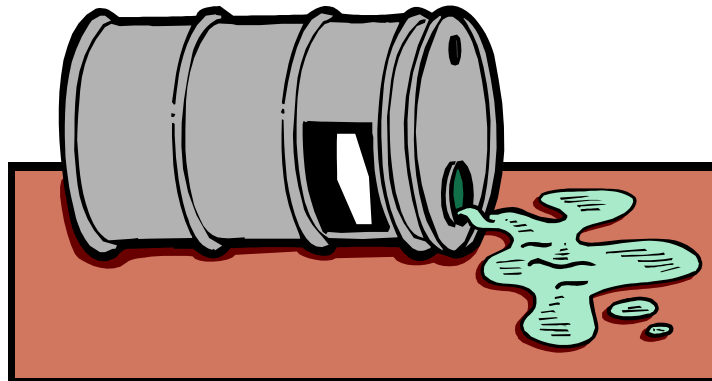
❖ If responsible for spill into environment*:

- Control and clean up spill
- Notify appropriate local agencies and regional office of Department of Ecology
- See also Ecology's [spill reporting site](#)

*"Spill into environment" means anywhere that might lead to the environment – cracks in concrete, on the ground where it could wash into a ditch, etc.

Spill Reporting – cont.

- ❖ Must report spills of oil or hazardous materials (products or waste) to:
 - National Response Center : 1-800-424-8802 AND
 - Washington Emergency Management Division: 1-800-258-5990 OR 1-800-OILS-911 AND
 - Appropriate Ecology regional office



Labeling - MQG/LQG

([WAC 173-303-200](#), [-630](#))

❖ All containers of DW must have:

- Hazardous Waste/Dangerous Waste label
- Risk label - specific to the waste

❖ Containers in storage area

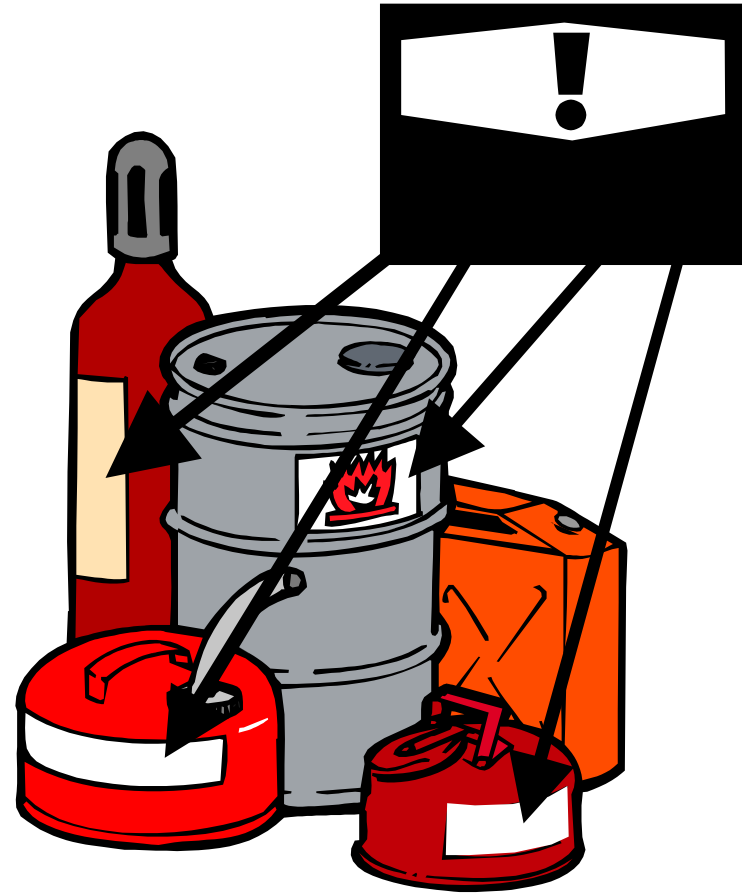
- Must show start date (starts clock for storage time limit)

Hazardous Waste	
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL	
If found, contact the nearest police or public safety authority, and the Washington State Department of Ecology or the Environmental Protection Agency	
Accumulation Start Date:	Generator Name:
Reportable Quantities (RQ): lbs <small>40 CFR Subchapter J, Part 302, Table 302.4</small>	Address:
Manifest Document #:	City:
Emergency Response Guide #:	State:
EPA Waste Code(s) and/or Characteristic(s)	Zip:
	EPA ID #:
EPA/DOT Shipping Name:	
Hazard Class:	
UN/NA #:	
Packing Group (PG):	
In the event of a spill or release of this hazardous waste, contact the US Coast Guard National Response Center at 1-800-424-8802 for information and assistance.	



Labeling (cont.)

- ❖ Remove or mark out labels from empty containers
- ❖ Labels must be visible for inspection
- ❖ Get labels from vendor, in Ecology's Toolbox CD, or from Ecology online at: [HW Labels](#)



Container Management - MQG/LQG

([WAC 173-303-630](tel:173303630))

❖ Closed

- Except when adding or removing waste

❖ In **good condition**

- No holes, cracks, weak spots, etc.

❖ **Compatible** with the waste being stored

❖ Handled and stored safely

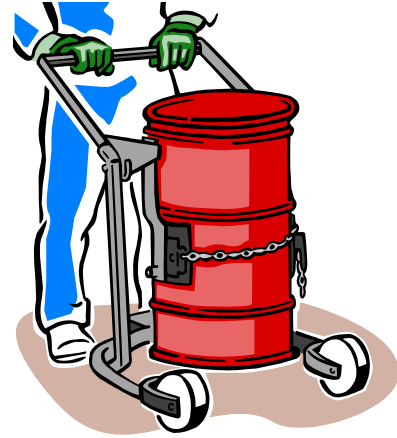
❖ Comply with **International Fire Code**

❖ Do not mix incompatibles



Satellite Accumulation Areas

(WAC 173-303-200)



- ❖ At or near point of generation
- ❖ Under control of operator or secured
- ❖ No more than 55 gallons of DW or one quart of AHW, per waste stream
- ❖ When container full, add start date; within 3 days move to primary storage area
- ❖ Ecology can require primary storage area standards (secondary containment)

General Inspection - MQG/LQG

(WAC 173-303-320)



- ❖ Must have written schedule
- ❖ Can be part of safety program or the weekly storage area inspection
- ❖ Show what's going to be looked at and how often that will be done.
- ❖ Keep a log - date, time, name/signature of inspector, observations, any spills or discharges, and remedial action taken)

Accumulation Area Inspection

MQG/LQG

[\(WAC 173-303-630\)](#)

- ❖ Inspect main storage areas **every week**
- ❖ Look for leaks, deterioration, and other factors that could lead to a release
 - ❖ Keep a log – date, time, name and signature, observations, anything you do to fix problems (remedial actions)
 - ❖ Sample log in Attachments folder



Secondary Containment

([WAC 173-303-200\(1\)\(b\)](#), [-630](#))

- ❖ Must be capable of collecting spills and leaks from waste containers
- ❖ Required of all storage areas built after 9/30/86
- ❖ Uncovered areas must be able to hold the additional volume from a 25-year storm that lasts 24 hours



Secondary Containment – cont.

(WAC 173-303-630)

- ❖ Containment system must be large enough to hold:
 - **10% of the volume of all** its containers; or
 - **Entire volume of the largest** container,
 - **Whichever is greater**
- ❖ Ecology can require that a storage area be covered



Secondary Containment – cont.

(WAC 173-303-630)

- ❖ Must not leak – free of cracks or gaps
- ❖ Seal floors for built-in systems
- ❖ Must be capable of containing liquids
- ❖ Must not leave containers sitting in liquid (sloped, elevated)
- ❖ Must have positive drainage control
- ❖ Must remove waste as soon as possible



Storage Area (MQG/LQG)

(WAC 173-303-630)

- ❖ Rows must be at least **30 inches apart**
- ❖ Rows must be **only two containers wide**
- ❖ Must separate incompatible wastes
- ❖ Incompatible wastes must have separate secondary containment systems, so a spill won't lead to mixing



Tanks (MQG/LQG)

([WAC 173-303-200](#), [-640](#))

- ❖ Required design standards
- ❖ Must be inspected.
- ❖ Standards differ according to generator status.
- ❖ Call regional Ecology office if you have questions.



Accumulation Time Limit - MQG/LQG

([WAC 173-303-200](#), [-201](#))



❖ **LQGs** – waste onsite for **90 days**

❖ **MQGs** – waste onsite for **180 days**

❖ Clock starts when:

- **First drop of waste** hits container in storage area
- Container in **satellite** accumulation area hits **55 gallons** for DW **or 1 quart** for AHW

Manifesting - MQG/LQG

([WAC 173-303-180. -210](#))

❖ Must manifest waste sent offsite

❖ Must use Uniform Hazardous Waste Manifest.

- Sample manifest in Attachments folder

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
5. Generator's Name and Mailing Address		Generator's Site Address (if different than mailing address)			
Generator's Phone		U.S. EPA ID Number			
6. Transporter 1 Company Name		U.S. EPA ID Number			
7. Transporter 2 Company Name		U.S. EPA ID Number			
8. Designated Facility Name and Site Address		U.S. EPA ID Number			
Facility's Phone		U.S. EPA ID Number			
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
1					
2					
3					
4					
14. Special Handling Instructions and Additional Information					
15. GENERATOR/SIGNER'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.					
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.					
Generator/Signer's Printed/Typed Name		Signature		Month	Day Year
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:					
17. Transporter Acknowledgment of Receipt of Materials					
Transporter 1 Printed/Typed Name		Signature		Month	Day Year
Transporter 2 Printed/Typed Name		Signature		Month	Day Year
18. Discrepancy					
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
18b. Alternate Facility (or Generator)		Manifest Reference Number		U.S. EPA ID Number	
Facility's Phone		U.S. EPA ID Number			
18c. Signature of Alternate Facility (or Generator)		Signature		Month	Day Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					
1	2	3	4		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18b					
Printed/Typed Name		Signature		Month	Day Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Manifesting – MQG/LQG cont.

- ❖ Final manifest must be returned within 35 days from day waste accepted by transporter
- ❖ If form not returned, you have 45 days from day waste accepted to file exception report:
 - Include copy of manifest
 - Cover letter explaining efforts taken to find waste and the results of those efforts



Land Disposal Restrictions - MQG/LQG

(WAC 173-303-140)

- ❖ Waste code drives Land Disposal Restriction requirements
- ❖ Treatment standards in federal regulations, at [40 CFR 268.40](#).
- ❖ Determine:
 - Subcategory
 - Treatability group
 - Appropriate treatment standards



Land Disposal Restrictions

MQG/LQG – cont.

[\(WAC 173-303-140\)](#)

- ❖ TSD/transporter usually provides paperwork
- ❖ Paperwork should include:
 - Waste codes
 - Available waste analysis data
 - Information about subcategories, etc.
 - Statement that waste is subject to LDRs
 - From table at 40 CFR 268.40
 - Constituents of concern, if necessary (some F codes)
 - Underlying hazardous constituents for characteristic wastes
 - Any other subdivision data

Transportation

([WAC 173-303-240](#), [-250](#), [-260](#), [-270](#))

❖ Transporter must have:

- Manifest
- Proper packaging
- Proper labeling of containers
- Proper placarding of vehicle



Destination Facilities

([WAC 173-303-200](#), [-070](#))

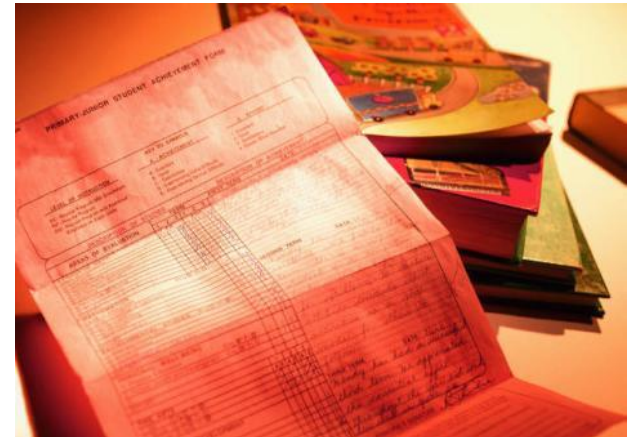
- ❖ Regulated generators (LQG and MQG) must send waste to a permitted Treatment, Storage, Disposal, and Recycling (TSD) facility
- ❖ SQGs have more options
 - MRW facility



Annual Reporting

(WAC 173-303-220)

- ❖ All active RCRA ID#s must submit an annual report to Ecology
- ❖ TurboWaste.net – online reporting service
<https://fortress.wa.gov/ecy/turbowaste/Login/Splash.aspx>
- ❖ Annual Reporting specialists available by phone at :
 - 1-800-874-2022 (in Washington only)
 - 360-407-6170



EPCRA

Emergency Planning and Community Right-to-Know

❖ Must report if:

- 1) Hazardous substances (waste and product) onsite exceed certain thresholds
- 2) Use certain amount of toxic substances

❖ More information available at

<http://www.ecy.wa.gov/epcra/index.html>

❖ Call 1-800-633-7585 (press 2), or e-mail

hsio@ecy.wa.gov

❖ Local and state authorities need this data to best plan for and respond to emergencies

Pollution Prevention Plans and Waste Minimization (WAC 173-307)

- ❖ Required for facilities generating more than 2,640 lbs DW/year
- ❖ Regulated generators who generate less than 2,640 lbs DW/year must certify their waste minimization on their manifests



Recordkeeping

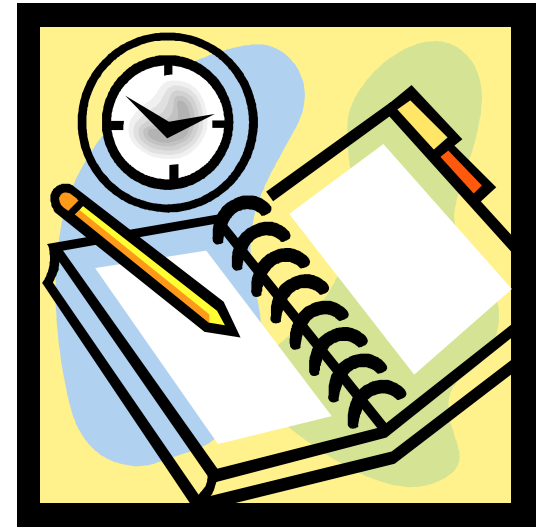
(WAC 173-303-210)

❖ Keep on-site for at least **five years**

- Manifests with signature of destination facility
- Designation records
- Annual reports
- Exception reports
- Inspection logs
- Other required reports

❖ Keep on-site for **three years**

- Final copy of manifest
- Keep initial copy of manifest with exception report, if you don't get final back



Regulations Specific to MQGs

(WAC 173-303-201)

- ❖ In lieu of contingency plan, post near emergency communication devices:
- Name and telephone number of Emergency Coordinator
 - Location of emergency equipment
 - Location of direct fire alarm, if present
 - Phone number of fire department, if no direct alarm



Regulations Specific to MQGs – cont.

- ❖ In lieu of training plan, must ensure all personnel are familiar with relevant waste handling and emergency procedures



Regulations Specific to SQGs

(WAC 173-303-070)

- ❖ Designate waste
- ❖ Manage waste safely
- ❖ Send waste to TSDR, an MRW facility, or a municipal landfill
- ❖ Respond to and report spills
(See Ecology's [spill reporting site](#))
- ❖ Submit an annual report if have an active ID#

